

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VISHAL SHAH, et al.,
Plaintiffs,
v.
FANDOM, INC.,
Defendant.

Case No. 24-cv-01062-RFL

**ORDER REQUESTING
SUPPLEMENTAL BRIEFING**

Re: Dkt. No. 71

The Court has reviewed Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. (Dkt. No. 71.) Plaintiffs are ordered to address the following issues through supplemental filings (including revised forms and supplemental declarations, as appropriate) by **Thursday, December 11.**


1. Epiq notes that 45% of the likely target audience for the class notice speaks primarily Spanish. Will the settlement website include Spanish versions of claim form and long form notice, and will the toll-free number have Spanish assistance available?
2. What was Epiq's rationale for calculating the claims rate? In *Mirmalek v. Los Angeles Times Commc'ns, LLC*, No. 3:24-cv-1797 (N.D. Cal.), which Plaintiffs identify as a comparable case involving similar claims, the total claims rate was estimated by Kroll at 1% to 6%, which is significantly higher than Epiq's estimate.
3. As in *Mirmalek*, should the settlement website be configured to only allow online claim forms from those who are visiting from an IP address that is among the 4.3

million identified, and require others to submit via mail, in order to reduce fraudulent claims?

4. Please modify the proposed preliminary approval order and long form notice as follows or explain any objection to the modifications:
 - a. Paragraph 20 of Preliminary Approval Order: Please add “unless the Court finds good cause to excuse this requirement” to the end of the following sentence “Only objections that are submitted in accordance with this paragraph shall be heard by the Court.”
 - b. Paragraph 29 of Preliminary Approval Order: As noted in its Civil Standing Order, this Court disfavors injunctions of current or future litigation in other courts based on conduct covered by the release, because the issue is generally better addressed by the assigned judges for such cases. Please either omit this paragraph or explain why such an injunction is appropriate.
 - c. Please edit the Preliminary Approval Order to set the time of the final approval hearing at 1:30 p.m., to be held both in person and via Zoom and include a link to <https://cand.uscourts.gov/judges/rfl/lin-rita-f>. Please also add the Zoom information for the final approval hearing to the long form notice.

IT IS SO ORDERED.

Dated: December 4, 2025


RITA F. LIN
United States District Judge